

U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

September 14, 2021

BY ECF

The Honorable Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States</u> v. <u>Harald Joachim von der Goltz</u>, 18 Cr. 693 (RMB)

Dear Judge Berman:

The Government respectfully submits this letter enclosing three stipulations between the Government and parties that submitted claims to certain seized assets in this case. Pursuant to the consent preliminary order of forfeiture entered by the Court regarding the defendant, Harald Joachim von der Goltz, two entities surrendered funds to the United States in or about March 2021. The United States subsequently provided notice to parties who potentially shared an interest in these funds.

On or about May 13, 2021, uniVersa Beteiligungs-AG submitted a claim that it holds an interest in these funds. *See* Dkt. No. 299. On or about May 21, 2021, Fairchild Holdings Corporation and Unicredit Bank AG also submitted claims to hold interests in these funds. *See* Dkt. Nos. 304, 306. The Government has reached an agreement with each of these entities to resolve these claims as reflected in the attached stipulations.¹

¹ The Government has engaged in discussions with other parties who submitted claims, and anticipates resolution of these claims by stipulation as well.

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Accordingly, the Government respectfully requests that the Court enter the proposed stipulations to finalize the resolution of these claims.

Respectfully submitted,

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